

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

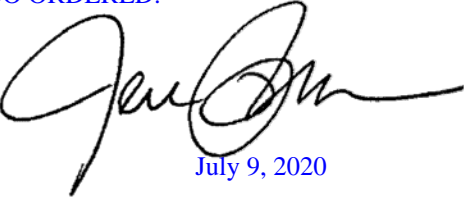
Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

July 9, 2020

VIA ECF

The Honorable Jesse M. Furman
United States District Judge
40 Foley Square
New York, NY 10007

Application GRANTED. The Clerk of Court is directed to terminate
ECF No. 17. SO ORDERED.



July 9, 2020

RE: United States v. Ruvioldy Cruz
20 Cr. 196 (JMF)

Dear Judge Furman:

I write - with no objection from the government and no objection from Pretrial Services - to respectfully request that the Court modify Mr. Cruz's bail conditions to remove the current condition of home incarceration and instead impose the condition of home detention with electronic monitoring.

On January 9, 2020, the Honorable Judge Debra Freeman imposed the following bail conditions, *inter alia*: A \$50,000 personal recognizance bond co-signed by two financially responsible persons; travel restricted to SDNY/EDNY; surrender of travel documents and no new applications; home incarceration with electronic monitoring, and strict pretrial supervision.

In the past six months since his release, Mr. Cruz has been fully compliant with the conditions of his bail and has demonstrated his commitment to abiding by the rules of supervision. We request this bail modification because it would benefit Mr. Cruz's post-release transition to be able to seek employment and get physical exercise outside (with prior approval from Pretrial Services). Assistant U.S. Attorney Mitzi Steiner and Pretrial Services Officer John Moscato do not object to Mr. Cruz's request. Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Mark Gombiner
Mark Gombiner, Esq.
Assistant Federal Defender
(212) 417-8718

SO ORDERED:

HONORABLE JESSE M. FURMAN
UNITED STATES DISTRICT JUDGE

cc: AUSA Mitzi Steiner (by ECF)